



6. Consultation and References

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Interagency Review

The NPS and Trust prepared the Trails Plan/EA concurrently with other applicable environmental reviews or consultation as required under Section 7 of the Endangered Species Act of 1973 (16 USC 1536), Section 307 of the Coastal Zone Management Act of 1972 (16 USC 1456) and the implementing Federal Regulations in 15 CFR Part 930, and Section 106 of the National Historic Preservation Act of 1966 (16 USC 470f). To comply with these requirements, the NPS and Trust actively solicited the participation of the U.S. Fish and Wildlife Service, the San Francisco Bay Conservation and Development Commission, the Advisory Council on Historic Preservation, and the California State Historic Preservation Officer. The views of these agencies, which have been integrated into the Trails Plan/EA, are discussed below. Copies of all relevant correspondence are available for review as part of the formal public record.

U.S. Fish and Wildlife Service

On November 25, 2001, the Trust and the NPS requested formal consultation with the U.S. Fish and Wildlife Service (USFWS) pursuant to Section 7 of the Endangered Species Act of 1973, concerning the Trails Plan. Prior to initiation of formal consultation, NPS and Trust representatives met and toured the Presidio with the USFWS on November 6, 2000 to discuss and orient the parties to the Trails Plan. The Trust and NPS again met with USFWS staff on May 17, 2002 to preliminarily discuss effects of the proposed plan. In the time between the initial meeting and request for formal consultation, the Trust and NPS corresponded verbally and in writing with the USFWS to review and discuss the proposed plan and consultation requirements. On July 23, 2002, the USFWS issued its Biological Opinion on the effects of the Trails Plan/EA on the endangered Raven's manzanita, San Francisco lessingia, Presidio clarkia, and the threatened Marin dwarf flax. After reviewing the current status of these plants, the environmental baseline for the action area, the effects of the plan and the cumulative effects, the biological opinion concluded that the Trails Plan, as proposed, will not jeopardize the continued existence of these species or adversely affect critical habitat of these species. The Biological Opinion also noted that, "in addition to habitat restoration, the Trails Plan will benefit native plant communities, including federally listed plants, and wildlife by managing human access and redirecting access away from sensitive habitat areas." Since issuance of the Biological Opinion by USFWS, the NPS and Trust have apprised the USFWS of several changes to the Preferred Alternative in response to public comments, which have resulted in a long-term beneficial effect (i.e., a net gain of 86.6 sm [932 sf] of proposed future habitat for the San Francisco lessingia). Due to the beneficial nature of these changes, it was determined that no further formal consultation was required.

San Francisco Bay Conservation and Development Commission

As the coastal management agency for the San Francisco Bay Pursuant to the Coastal Zone Management Act of 1972, the San Francisco Bay Conservation and Development Commission (BCDC) is required to review Federal projects which could affect the coastal zone and determine whether the project is consistent with the BCDC's Amended Coastal Zone Management Program for San Francisco Bay. On November 15, 2002, the NPS and Trust submitted a description of the Trails Plan/EA and requested that the Commission concur that the plan is consistent with the BCDC's Amended Coastal Zone Management Program for the San Francisco Bay segment of the California coastal zone. Based on the information contained in those materials, on February 20, 2003, the BCDC considered and found that the Trails Plan is consistent with the provisions of the McAteer-Petris Act and the policies of the San Francisco Bay Plan. The BCDC's Letter of Concurrence included the following statements:

...[I]mplementation of the plan would involve the placement of small amounts of materials and the substantial change in use of areas such that the placement, extraction, or change in use would not have a significant adverse effect on present or possible future maximum feasible public access to the Bay consistent with the project, on present or possible future use for a designated priority water-related use, and on the environment, as defined in Commission Regulation Section 10601(b)(1) and thus is equivalent to a "minor repair and improvement." In addition, San Francisco Bay Plan Map No. 4 identifies the Presidio as a park priority use area and contains a policy that states "[i]f and when not needed by Army, retain at least shoreline and undeveloped areas as regional park." (Recreation Policy 5(a) and Bay Plan Map No. 4, Policy No. 24). The implementation of the Trails Plan would be consistent with the Bay Plan Map notes by encouraging recreational use of the Presidio.

Advisory Council on Historic Preservation/ California State Historic Preservation Officer

Section 106 of the National Historic Preservation Act (NHPA) of 1966 requires the NPS and the Trust to take into account the effect of their undertakings on historic and cultural resources, including the National Historic Landmark District (NHLD). The NPS and the Trust each entered into programmatic agreements (PA) with the ACHP and the SHPO that apply to all undertakings under their jurisdictions. The PAs provide a framework for reviewing the project effects internally and for consulting with other parties under certain circumstances.

NPS and Trust staff reviewed the Trails Plan/EA and determined that the proposed undertaking will not have an adverse effect on historic properties that contribute to the significance of the NHLD, because all work will be in keeping with the Secretary of Interior's Standards for the Rehabilitation of Cultural Landscapes and Historic Properties and will conform to the Standards, Principles and Planning District Guidelines of the Presidio Trust Management Plan to the maximum extent possible. The NPS and the Trust are committed to conducting additional NHPA review within their separate jurisdictions as necessary at the time individual trail segments are designed and proposed for funding. On February 24, 2003, the NPS and the Trust submitted the Trails Plan/EA to the ACHP

and SHPO with a request for concurrence with this determination. The NPS and Trust supplemented this information with the record of public commentary during the public review period. On March 18, 2003, the Trust and NPS held a telephone conference with the SHPO (ACHP could not be present). Based on review of the information, SHPO staff (and later, ACHP staff) concurred with the NPS and Trust finding that there will be no adverse effect to historic properties caused by this undertaking. In a follow-up letter memorializing the course of the consultation, the SHPO thanked the NPS and Trust staff for "preparing an informative and responsive consultation package for this undertaking and for committing your agencies to carrying out all measures needed to secure the validity of the 'no adverse effect' finding when individual actions are implemented in accordance with the final Trails and Bikeways Plan."

List of Persons and Agencies Consulted

Valary Bloom, Coast-Bay-Delta Branch, Endangered Species Program, U.S. Fish and Wildlife Service

Carla Chenault, Project Analyst, California State Coastal Conservancy

Jane Crisler, Historic Preservation Specialist, Advisory Council on Historic Preservation

Mike Fris, Deputy Assistant Field Supervisor, U.S. Fish and Wildlife Service

Oliver Gajda, Assistant Bicycle Program Manager, City and County of San Francisco Department of Parking and Traffic

Andrea M. Gaut, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission

Don Hankins, Biologist, Sacramento Fish and Wildlife Office, U.S. Fish and Wildlife Service

Harvey Katz, Senior Planner, Golden Gate Bridge, Highway and Transportation District

Hans Kreutzberg, Chief, Review and Compliance, California State Historic Preservation Office

Joseph E. LaClair, Senior Planner, San Francisco Bay Conservation and Development Commission

Lindy L. Lowe, Coastal Planner, San Francisco Bay Conservation and Development Commission

Michael Sallaberry, Assistant Transportation Engineer, Bicycle Program, City and County of San Francisco Department of Parking and Traffic

David Snyder, Executive Director, San Francisco Bicycle Coalition

Laura Thompson, Bay Trail Planner, Association of Bay Area Governments

Holly Van Houten, Executive Director, Bay Area Ridge Trail Council

Alan Zahradnik, Director of Planning, Golden Gate Bridge, Highway and Transportation District

List of Preparers

National Park Service, Golden Gate National Recreation Area

Andrea Lucas, Landscape Architect, Project Manager

Garrett Lee, Natural Resources Specialist

Wendy Poinot, Environmental Protection Specialist

Heather Marashi, Environmental Protection Specialist

Michelle Rios, Architect

Pat Sacks, Landscape Architect

Presidio Trust

Chris Ottaway, Landscape Architect, Project Manager

Mark Helmbrecht, Senior Transportation Planner

Sharon Farrell, Natural Resources Planner

Ben Jones, GIS Specialist

Jennifer Knauer, Landscape Architect

Allison Stone, Environmental Planner

Moore Iacofano Goltsman, Inc.

Lawrence Wight, ASLA, Project Director

Sally McIntyre, Consulting Principal

Laurel Kelly, ASLA, Landscape Architect

Sharon McNamee, Planner

Environmental Science Associates

David J. Full, AICP, Project Director

Tina M. Ogawa, Project Manager

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